

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<div>SECURITIES INVESTOR PROTECTION CORPORATION,</div> <div>Plaintiff-Applicant,</div> <div>v.</div> <div>BERNARD L. MADOFF INVESTMENT SECURITIES LLC,</div> <div>Defendant.</div>	<div>Adv. Pro. No. 08-01789 (CGM)</div> <div>SIPA LIQUIDATION</div> <div>(Substantively Consolidated)</div>
<div>In re:</div> <div>BERNARD L. MADOFF,</div> <div>Debtor.</div>	
<div>IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff,</div> <div>Plaintiff,</div> <div>v.</div> <div>EQUITY TRADING PORTFOLIO LIMITED,</div> <div>Defendant.</div>	<div>Adv. Pro. No. 10-04457 (CGM)</div>

**STIPULATION EXTENDING TIME FOR RESPONSE OR OBJECTION,
REPLY BRIEF, AND HEARING DATE FOR DECHERT'S MOTION FOR
LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANT EQUITY
TRADING PORTFOLIO LIMITED**

Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, individually, by

and through his counsel, Baker & Hostetler LLP, and Equity Trading Portfolio Limited (“Equity Trading”), by and through its counsel, Dechert LLP (“Dechert”), hereby stipulate and agree as follows:

WHEREAS, on November 2, 2023, Dechert filed a notice of motion for leave to withdraw as counsel for Equity Trading Portfolio Limited and a memorandum of law in support of its motion for leave to withdraw (the “Motion”) in the Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”);

WHEREAS, the Trustee’s current deadline to file a response or objection to Dechert’s Motion is on December 1, 2023;

WHEREAS, Dechert’s deadline to file a reply brief is December 11, 2023;

WHEREAS, the hearing on the Motion is set for December 20, 2023 at 10:00 a.m. (Eastern Time), or as soon thereafter as counsel can be heard;

WHEREAS, the Trustee, by and through his counsel, Baker & Hostetler LLP, and Dechert have jointly agreed to extend the Trustee’s deadline to file a response or objection to Dechert’s Motion;

IT IS HEREBY STIPULATED AND AGREED, by and between the Trustee and Equity Trading by the endorsement of their counsel below, and **SO ORDERED** that:

1. The Trustee’s response or objection deadline will be extended from December 1, 2023 to December 15, 2023;
2. Dechert’s deadline to file a reply brief will be extended from December 11, 2023 to January 15, 2024;
3. The hearing on the Motion will be continued from December 20, 2023 to January 24, 2024 at 10:00 a.m. (Eastern Time), or as soon thereafter as counsel can be heard.

Dated: November 30, 2023
New York, New York

/s/ Marco Molina

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SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate of
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/s/ Neil A. Steiner

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*Attorneys for Equity Trading Portfolio
Limited*

Dated: December 1, 2023
Poughkeepsie, New York



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**